

From: [Susan Spalding](#)
To: [Bill Shafford](#); [MCKERCHER, David \(Frisco\)](#)
Cc: eileencanavan@tx.rr.com
Subject: Re: Exide Frisco, TX landfill clean up comments-
Date: 01/25/2013 03:47 PM

David and Bill -- I am forwarding comments from Eileen Canavan, a Frisco resident. The website was not accepting comments. Wanted to be sure you received these by the deadline.

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▼ ---01/25/2013 03:42:57 PM---Hello Susan- I tried to post this comment on the Exide website yesterday early afternoon around 2-3

From: <eileencanavan@tx.rr.com>
To: Susan Spalding/R6/USEPA/US@EPA
Date: 01/25/2013 03:42 PM
Subject: Exide Frisco, TX landfill clean up comments-

Hello Susan-

I tried to post this comment on the Exide website yesterday early afternoon around 2-3 p.m. Their website landfill comment section was not working and gave no indication that my comment was received. Thank you for personally delivering it on my behalf.

The Exide landfill clean up plan is not an effective or satisfactory solution to the violation of illegal disposal of toxic wastes in a class II landfill. It is my understanding that the Free Flow 100 product usage is based upon the specific concentration levels of lead, cadmium, arsenic and other toxins taken in batch samples BEFORE treatment and formulas can be applied correctly. In Exide's own statements when they were caught in this serious violation of burying hazardous wastes in our city, their process was to bury the lead slag first in the landfill and if their sporadic tests results revealed elevated concentrations of lead and other toxins above the law, they then proceeded to dig up the batch and retreated it again with FreeFlow100. This is inappropriate application of the product and its effectiveness.

Exide's practice of burying and re-treating AFTER THE FACT has failed the environment and the citizens who must live, work and play with the consequences of their actions for years to come. Unless Exide does the right thing and remove the slag completely.

At this point, anything other than COMPLETE REMOVAL of the slag from the Frisco landfill and disposal OFF SITE, is unacceptable. Exide has lost its trust and credibility with the community in which they have operated and repeatedly violated the TCEQ and EPA laws for handling hazardous waste products. In fact, it appears to me now, that ONLY Exide secondary lead

smelter plants have ON SITE landfills. Since the EPA nor TCEQ allowed Exide to bury hazardous waste on site, they should completely remove it to an off site hazardous waste landfill.

Since Exide did not treat the lead slag correctly the first time and never had a permit to bury it - we would like it completely removed rather than re-treating it. The history for FF100 product success is also too new to hang our hats on. Free Flow 100 has but ONE 15 year study which shows that the treated lead slag is stabilized after 15 years. Since Exide never had a hazardous waste permit to bury the lead in the first place- removal is the most trusted, successful, long term solution. i am sure it is less costly to exide to re-treat it and re-bury it on site but anything less than removal is not retribution for the crime nor does it provide for the long term safety of Frisco residents and our environment.

Thank you-

Eileen Canavan
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